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*Attorneys for Creditors,
Majesti Mai Bagorio, et al.*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**JOINDER BY BAUM HEDLUND ARISTEI
GOLDMAN CAMP FIRE VICTIMS
CLIENTS IN THE OFFICIAL COMMITTEE
OF TORT CLAIMANTS' MOTION FOR
ENTRY OF AN ORDER DIRECTING
SUPPLEMENTAL DISCLOSURE IN THE
FORM OF A LETTER FROM THE TCC
[Dkt. No. 6636]**

Hearing: Telephonic Appearances Only
Date: April 7, 2020 (requested)
Time: 10:00 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 **TO THE CLERK OF THE ABOVE-ENTITLED COURT, THE DEBTORS AND THEIR**
2 **ATTORNEYS OF RECORD, UNITED STATES TRUSTEE, AND OTHER INTERESTED**
3 **PARTIES:**

4 Claimants Majesti Mai Bagorio, et al., (“Baum Hedlund Aristei Goldman Camp Fire
5 Victims Clients”) hereby join in the April 6, 2020 filing by the Official Tort Claimant Committee
6 entitled “The Official Committee of Tort Claimants’ Motion for Entry of an Order Directing
7 Supplemental Disclosure in the Form of a Letter from the TCC” [Dkt. 6636]. Within that motion
8 the TCC stated that “At this point, the mediation is at an impasse” and further states “The TCC
9 further requests that the supplemental statement be provided to the fire victim claimants so that
10 they have all the information related to the plan. The TCC further requests that the solicitation
11 agent be directed to serve the proposed letter on all Fire Victim Claimants immediately upon
12 entering in the order on this motion.”
13
14

15 PLEASE TAKE FURTHER NOTICE that Baum Hedlund Aristei Goldman Camp Fire
16 Victims Clients support this supplement given that active and aggressive solicitation of votes is
17 ongoing by proponents of the plan regardless of the omission of material facts and inadequate
18 disclosure being represented to victims. There are robo-calls, text message campaigns, campaign
19 events and other solicitation and advertising practices that paint a distorted view of the plan and
20 its risks. This is particularly disconcerting in light of the impasse and lack of agreement around
21 material issues of the plan and related victim settlement. Examples of these efforts can be viewed
22 as Exhibit A and are attached to this joinder.
23

24 PLEASE TAKE FURTHER NOTICE that in addition to providing the TCC supplement to
25 the disclosure statement, claimants respectfully request that votes to date be withdrawn and that
26 re-votes are requested. There has been a concerted effort from some parties to push for early
27 voting before supplemental disclosures and other relevant information is brought to light. This
28

1 heavily funded effort is undermining the due process rights of victims to push a particular agenda
2 related to this case and should not be tolerated by the court.

3 Dated: April 7, 2020

Respectfully submitted,

4 BAUM HEDLUND ARISTEI GOLDMAN

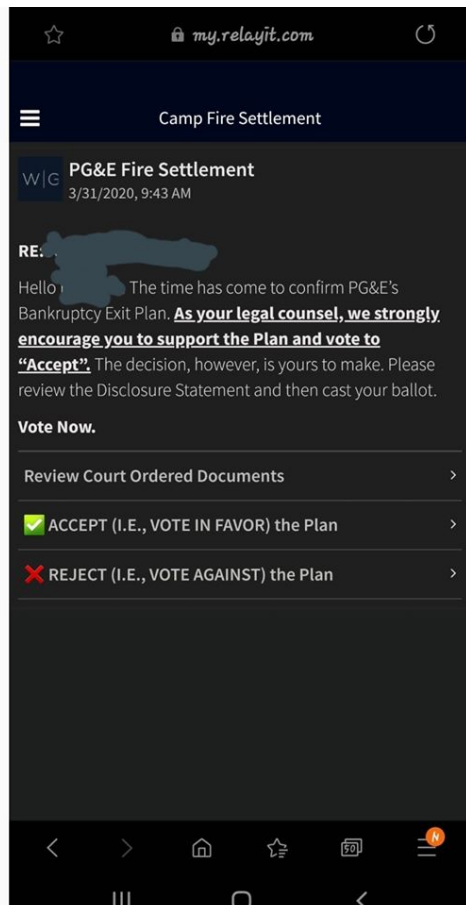
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6 /S/ Ronald L.M. Goldman

7 By: _____

Ronald L.M. Goldman
Diane Marger Moore, *Pro Hac Vice*
Attorneys for Creditors,
Majesti Mai Bagorio, et al.

Exhibit A

The following are examples of ongoing solicitation for victim votes that do not adequately disclose plan benefits and risks for victims to make an informed vote:



1 **PROOF OF SERVICE**

2 I am over the age of 18 years and not a party to the within cause. My business address is
3 Baum Hedlund Aristei Goldman, 10940 Wilshire Boulevard, 17th Floor, Los Angeles, California
4 90024. On this day, April 7, 2020, I served the following document(s) in the manner described
below:

5 **JOINDER BY BAUM HEDLUND ARISTEI GOLDMAN CAMP FIRE VICTIMS**
6 **CLIENTS IN THE OFFICIAL COMMITTEE OF TORT CLAIMANTS' MOTION FOR**
7 **ENTRY OF AN ORDER DIRECTING SUPPLEMENTAL DISCLOSURE IN THE FORM**
OF A LETTER FROM THE TCC [Dkt. No. 6636]

8
9 **X** **VIA ECF:** I caused the aforementioned documents to be filed via the Electronic Case
10 Filing (ECF) system in the United States Bankruptcy Court for the Northern District of
California, on all parties registered for e-filing in Case Number Case No. 19-30088
11 (DM). Counsel of record are required by the Court to be registered e-filers, and as such
are automatically e-served with a copy of the documents upon confirmation of e-filing.
12

13 I declare under penalty of perjury, under the laws of the United States of America, that
the foregoing is true and correct. Executed on April 7, 2020.
14

15 *Diane Marger Moore*

16 DIANE MARGER MOORE
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